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January 28, 2020

VIA ECF

Honorable Cathy Seibel
Federal Building and US Courthouse
300 Quarropas Street
White Plains, New York 10601

Re: United States v. Maria Luisa Estrella Jaidi et al., 19 Cr. 890 (CS)

Dear Judge Seibel:

This firm represents Maria Luisa Jaidi, the defendant in the above-captioned matter. We write to respectfully request a 60-day adjournment of the next pretrial conference, presently scheduled for January 31, 2020, to provide additional time for the production and review of Rule 16 discovery in this case.

By way of background, the first pretrial conference in this case was held on December 18, 2019. On or about December 30, 2019, we received an initial production of Rule 16 discovery materials from the Government, consisting of approximately 150 gigabytes of data (more than 46,000 files). Since then we have been diligently working to upload and review this material, including working through certain technological issues in consultation with the Government. On January 24, 2020, the Government advised that it was preparing to produce additional discovery materials, consisting of up to 2 terabytes of further information, and that it plans to complete this second production by the end of this week or early next. Finally, the Government has advised that additional materials are likely to be produced subsequent to the second production, with the goal and expectation of substantially completing the production of Rule 16 discovery by late February 2020.

In light of this schedule of ongoing discovery, and to afford the defense time to receive and review the above-described material, the parties are proposing a 60-day adjournment of the pretrial conference date, with the understanding that the time between January 31 and the

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adjourned date will be excluded under the Speedy Trial clock. I have spoken to A.U.S.A. Gillian Grossman who has no objection to the requested relief.

Respectfully submitted,



Evan T. Barr

cc: All counsel of record (via ECF)

The 1/31/20 conference is adjourned to 3/31/20 at 12 noon. The time between now and 3/31/20 is hereby excluded under the Speedy Trial Act in the interests of justice. I find the ends of justice served by the exclusion outweigh the best interests of the public and the defendant in a speedy trial, because it will enable the Government to produce and the defense to review a large volume of discovery material.

SO ORDERED.


CATHY SEIBEL, U.S.D.J.

1/28/20